

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Rudikh & Associates, LLC  
223 Highway 18, Suite 204  
East Brunswick, NJ 08861  
Yan Rudikh, Esq.

In Re:

Luis Ramirez

Case No.: 19-19024

Judge: Michael B. Kaplan

Chapter: 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION**

The debtor in this case opposes the following (**choose one**):

1. ☒ Motion for Relief from the Automatic Stay filed by Ahmed Albrolisy, creditor,

A hearing has been scheduled for July 9, 2019, at 9:00 a.m.

☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_.

☐ Certification of Default filed by \_\_\_\_\_.

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

☐ Payments have been made in the amount of \$ \_\_\_\_\_, but have not been accounted for. Documentation in support is attached.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

☒ Other (**explain your answer**):  
See certification attached.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: July 1/19

/s/ Luis Ramirez  
Debtor's Signature

Date: \_\_\_\_\_

\_\_\_\_\_  
Debtor's Signature

**NOTES:**

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.

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Attorney for Debtor: Luis Ramirez

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IN RE:

Luis Ramirez

Debtors

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Chapter 13  
Case No.: 19-19024-MBK

**CERTIFICATION IN OPPOSITION**

HEARING DATE: JULY 9, 2019  
AT 9:00 AM

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I, Luis Ramirez, fully age here by certify follows:

1. I am the Debtor in the within chapter 13 Bankruptcy and am making this Certification in response to this Notice of Motion to Relief the Stay which is filed by the creditor premature, in that said Motion outlined the facts that my redemption period ends July 1, 2019. Said Motion was filed on June 10, 2019 and this Motion was obviously premature and it needs to be withdrawn and refiled. I am also in the process of preparing a Motion to Sell this property and I should have all the necessary funds to be able to redeem it at the time of sale
2. I respectfully request that this Motion not be considered and immediately withdrawn.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ Luis Ramirez  
LUIS RAMIREZ